

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

MDL No. 19-2875 (RBK)

This document relates to:  
*All Actions*

ORDER NO. \_\_\_\_

THIS MATTER having been opened to the Court by Plaintiffs for entry of an order precluding improper deposition designations, and the Court having considered the submissions of the Parties, and for good cause shown:

It is hereby ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2024 that Plaintiffs' motion is granted: (1) Defendants cannot designate affirmative deposition testimony for available witnesses, such as their officers, executives, corporate designees, expert witnesses, and former employees, and (2) Defendants' counter-designations should not be presented in Plaintiffs' case unless necessary for "completeness" to avoid misleading the jury on the specific testimony designated by Plaintiffs.

/s/

\_\_\_\_\_  
Hon. Robert B. Kugler, U.S.D.J.